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December 05, 2007

Via fax & regular mail

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Attn: Daniel Filor, AUSA
U. S. Attorney's Office, SDNY
Civil Division
86 Chamber Street, 6th floor
New York, NY 10007

Re: Kakushadze v. Chertoff
Case No. 1:07-cv-08338

Dear Mr. Filor:

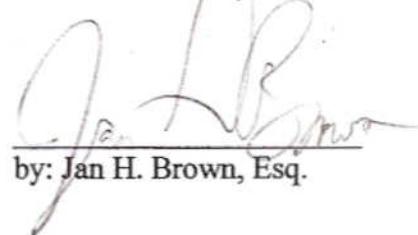
As a follow up to our recent conversation I wish to advise you as to why it is urgent that Zurab Kakushadze be naturalized as soon as possible. Primarily Mr. Kakushadze wants to sponsor for lawful permanent resident status, his mother, Ludmila Kakushadze, who is a citizen of Georgia and residing in that country. Georgia is at present suffering dire political and economic conditions, (see exhibit A) which have impacted upon Mr. Kakushadze's mother. For example, Mr. Kakushadze's mother has no central heating system in her apartment, as conditions have deteriorated to the point where central heating doesn't exist in most places. The only way she can stay warm during the cold nights is by turning on her gas stove, which as we know is a very dangerous way of staying warm. There is a small window she must keep open so that carbon monoxide does not accumulate. It is possible that this arrangement is slowly poisoning her based on impurities in the gas being burned. Additionally, the supply of gas is not consistent, so there are times when this woman is subject to freezing nights. Electricity does not flow consistently either, so an electric heater is not a solution to her physical discomfort. There is no hot water and frequently there is no water whatsoever, so it is difficult for Ludmila Kakushadze to maintain both cleanliness and healthful conditions. The country is politically unstable and its future is uncertain, further stressing Mrs. Kakushadze.

Ludmila Kakushadze is a widow, whose husband died in January 2005 of cardiovascular disease, at the age of 64, due to lack of adequate medical treatment, which was unavailable. Mr. Kakushadze believes his father would still be alive were he to have

been in the U.S as we have superior medical treatment available (see exhibit B, medical conditions in Georgia). Mrs. Kakushadze's last living parent died in July, 2006 so she is all alone living in these terrible conditions. Medical care is deteriorating in Georgia, so if she were to fall seriously ill, there is a danger that she will not survive. Additionally, Ludmila's entire surviving family resides in the United States. This consists of Mr. Kakushadze and his naturalized U.S. citizen wife, Elodie Gora-Kakushadze, and U.S. citizen daughter, Mirabelle Kakushadze, as well as Irakli Kakushadze, Ludmila's other child, a U.S. resident who is married to a naturalized U.S. citizen and resides in Reston, Virginia.

Based upon the dire conditions in Georgia and for purposes of family unification, we respectfully request that you advise your client, U.S.C.L.S., to expedite the processing of Zurab Kakushadze's pending naturalization application.

Very truly yours,
JAN H. BROWN, P.C.



by: Jan H. Brown, Esq.

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Residents of the Georgian capital, Tbilisi, have been queuing for bottled gas since supplies from Russia failed.

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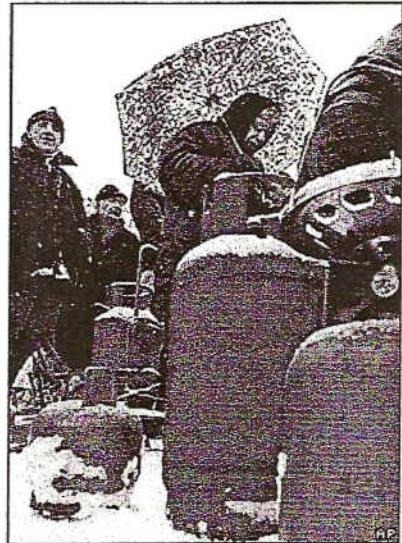
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Because of Georgia's chronic energy crisis, blackouts continue to darken Tbilisi with some regularity, particularly in the winter. Be prepared for airport delays if a prolonged outage occurs. Though blackouts have, in the past, disabled the airport's guidance beacon, no serious accidents have occurred here. Two local carriers - Georgian Airlines and Air Georgia - have hubs at Tbilisi, from which they serve various regional destinations. Larger airlines serving the airport include British Airways, Lufthansa and Turkish Airlines; Aeroflot provides service to Tbilisi from destinations throughout the former Soviet Bloc via Moscow.

The highway that connects Georgia and Russia along the Abkhazian coast via the Caucasian Range tunnel is closed. Other road entry points include the route via the Georgian Military Highway, which runs through the Darieli gorge and through to Turkey, Armenia and Azerbaijan in the south. Travellers report that bribes are often expected at border crossings - bring patience and a sense of humour.

Three large ports (Batumi, Poti, Sukhumi) are located on the Black Sea coast of Georgia. Ferries run from both ports to Sochi in Russia, Ilyichevsk in Ukraine. Hitching lifts on the cargo boats to Odessa, Trabzon and Istanbul is very difficult.

Getting around

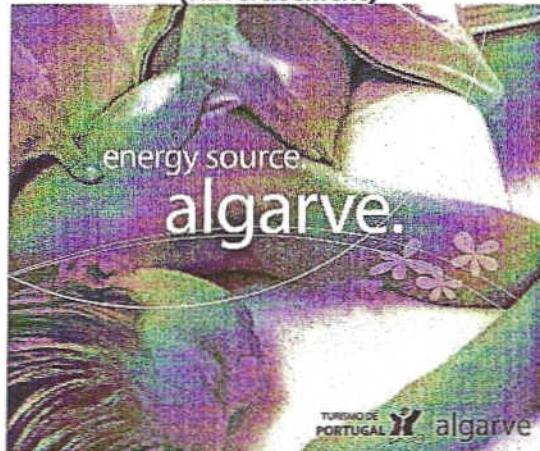
There are domestic flights available between Tbilisi's Central Airport and Kutaisi, Batumi and Senaki. If you're near the mountains, you might find helicopters used, but they're as expensive as you would imagine.

Aside from Tbilisi, roads are generally in poor condition and lack shoulder markings and centre lines. Driving at night can be especially dangerous, and there have been reports of tourists being robbed and car jacked, though it's certainly not the norm; even so, stop only for police or the military. Hire cars with a driver are available for around 40.00 plus petrol.

The Transcaucasian Railway main line connects two railway branches, from Baku (Azerbaijan) and from Yerevan (Armenia). The main line stretches towards Russia through Georgia, along the Black Sea coastline. Currently the line is blocked due to the conflict in Abkhazia, so rail travel in the north and west is very difficult. Travel elsewhere, Tbilisi to Batumi for example, is possible, though train services are infrequent to some destinations. Buses regularly run from Tbilisi to regional centres in Georgia as well as to Armenia, Azerbaijan, Russia and Turkey.

Public transport is reasonably priced and quite regular in the capital, with an underground train system, bus, cable-car and trams all plying the streets of Tbilisi. Locals have recently been issuing warnings about theft on the underground. Taxis are mainly privately owned cars but registered taxis

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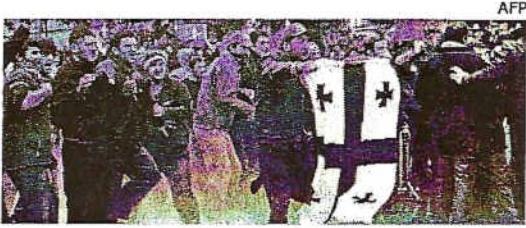
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GEORGIA'S current political mess started with allegations of cronyism and abuse of power at the highest level. It continued with demonstrations, mostly peaceful but with some violence. They were broken up by a police action involving a lot more. Then the authorities said they were battling an alleged Kremlin-backed putsch.

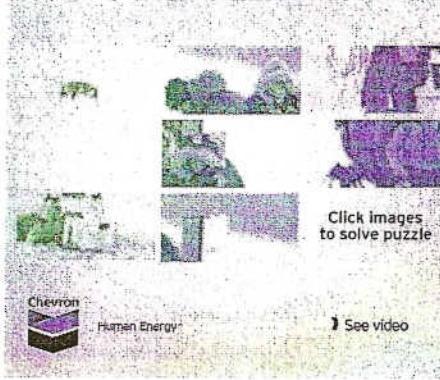
Now a state of emergency has enabled the authorities to black out opposition radio and television stations (and in some cases smash their equipment). Public meetings have been banned. That has given all sides a chance to shout "provokatsiya", a Russian word with no direct translation, much used in the ex-communist world. Literally, it means a "provocation", but with elements of "stunt" and "dirty trick".

The upshot is that Mikheil Saakashvili, the strong-headed pro-Western president who triumphed in the 2003 "rose revolution", seems to have let himself be provoked to the point of near disaster. He has handed a propaganda gift to his Russian adversaries, severely dented his self-proclaimed credentials as a democrat, and dismayed his friends abroad. On Thursday November 8th Mr Saakashvili tried to defuse some of the tension by calling hasty presidential elections for January 5th.

Mr Saakashvili and his allies in government already have a strong electoral mandate. Big demonstrations do not necessarily trump that. The country's economic, regulatory and military reforms have been by any standard a stunning success. And the opposition is in large part incoherent and hysterical, and may well be financed or even organised by outside forces that wish the country ill. Today Georgia publicly accused Badri Patarkatsishvili, a tycoon who co-owns Imedi, an opposition television and radio station, with Rupert Murdoch, of trying to stage a coup (how Mr Patarkatsishvili, who is exiled from Russia, would fit in with the alleged Kremlin involvement is not clear).

But other aspects are troubling. The presidency's strong powers make it particularly important that decision-making is based on the best available advice and is exercised with scrupulous clarity and care. Mr Saakashvili's impulsive temperament, coupled in some cases with a blind eye to his friends' flaws, have created a worrying impression of both cronyism and a liking for a brusque, even bullying, style. He is keener on building a functioning state than building a democracy. His heroes are not the likes of Thomas Jefferson, but Kemal Ataturk.

Economic reform alone is not a recipe for happiness. Georgia's stunning GDP growth (perhaps over 10% by the end of the year, despite Russian trade sanctions) is great news for the well-educated urban middle classes. It has yet to mean as much for the ill-educated, elderly and rural population. But they have votes too: making them



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In part, this is because of the painful changes the country has undergone under the leadership of Saakashvili and his young team.

The World Bank has lavished the Georgian government with praise for achieving double-digit economic growth, overcoming the country's energy shortages, tackling corruption and securing a big increase in foreign investment.

But radical economic reforms have been an unpleasant cold shower for most citizens. One third of the population still lives on or below the poverty line, unemployment is still high and price rises have not been matched by corresponding raises in pensions and benefits.

However, experts say the latest street protests were triggered as much by style as by substance – specifically by the once-populist president's failure to communicate with his people, hold a dialogue with his opponents, or tolerate criticism.

Saakashvili has spent much of his presidency on foreign trips which have boosted Georgia's international image, but left him less sensitive to how his leadership is perceived at home.

"One can say with confidence that it was the cynicism of the authorities that brought people out on to the streets," political analyst Paata Zakareishvili told IWPR. "The decisive factor was the arrogance, high-handedness and excesses of the authorities and their 'I do what I want' attitude."

Archil Gegeshidze of the Georgian Foundation for Strategic and International Studies noted that "in Saakashvili's actions, both in this specific instance [the events of November 7] and in general, one senses the strong influence of his inner circle. And this influence has led him to fail to respond properly."

There are also serious concerns about the state of the judicial system and the protection of human rights and private property.

One of the authors of Georgia's current constitution, Professor Vakhtang Khmaladze, told IWPR, "The low level of independence of the courts in Georgia has had a negative impact on the state of human rights and also on the economy. People have the feeling that justice in this country is a selective process."

Saakashvili has blamed Russia for provoking the political crisis.

Under his presidency, relations with Moscow have sunk to a new low, with Russia imposing an economic embargo on Georgia and halting the issuing of visas to its citizens.

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Information on vaccinations and other health precautions, such as safe food and water precautions and insect bite protection, may be obtained from the Centers for Disease Control and Prevention's hotline for international travelers at 1-877-FYI-TRIP (1-877-394-8747) or via the CDC site at <http://www.cdc.gov/travel/default.aspx>. For information about outbreaks of infectious diseases abroad consult the World Health Organization's (WHO) web site at <http://www.who.int/en>. Further health information for travelers is available at <http://www.who.int/ith/en>.